

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

ENERGY DIVISION

AGENDA ID: 17633  
RESOLUTION E-4993  
September 12, 2019

**R E S O L U T I O N**

Resolution E-4993. Denies Pacific Gas and Electric Company's (PG&E) request for deviation from Electric Rule 20A in Accordance with General Order 96-B, Section 9.2.3.

PROPOSED OUTCOME:

- Denial of PG&E's request to deviate from Electric Rule 20A on the behalf of the City of Oakland to accommodate its proposed Rule 20A project referred to as Piedmont Pines Phase II.

SAFETY CONSIDERATIONS:

- There is no impact on safety.

ESTIMATED COST:

- The current cost estimate of the proposed Piedmont Pines Phase II Rule 20A undergrounding project is \$16,495,000 (if allowed).

By Advice Letter 5464-E and 5464-E-A, Filed on January 4, 2019 and March 21, 2019 respectively.

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**SUMMARY**

This Resolution denies Pacific Gas and Electric Company's (PG&E) request to deviate from Electric Tariff Rule 20A in accordance with General Order 96-B, Section 9.2.3.<sup>1</sup> PG&E requests to deviate from Rule 20A to allow the City of

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<sup>1</sup> CPUC General Order 96-B, Rule 9.2.3 ("At all times, a utility other than a telephone corporation may provide service (other than resale service) to a government agency for free, or at reduced rates and charges, or under terms and conditions otherwise

*Footnote continued on next page*

Oakland ("City") to include within the Piedmont Pines Area Underground Project Phase II (Phase II project) some ancillary streets and parcels<sup>2</sup> that do not meet the public interest criteria set forth in Rule 20A. Rule 20B allows communities to pursue undergrounding projects that do not meet the Rule 20A public interest criteria if residents fund the greater portion of the project.<sup>3,4</sup> PG&E and the City could alternatively proceed with undergrounding in the project areas that do not meet the Rule 20A funding criteria under Rule 20B.

## **BACKGROUND**

### **Procedural Background**

Utilities annually allocate work credits under Rule 20 to communities (cities and unincorporated areas of counties) to convert overhead electric infrastructure to underground infrastructure.

Since ratepayers contribute virtually all of the funds for Rule 20A projects through utility rates, the projects must be in the public interest by meeting one or more of the following criteria listed in the Rule 20A Tariff:

1. Such undergrounding will avoid or eliminate an unusually heavy concentration of overhead electric facilities;

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deviating from its tariffs then in effect. The utility may begin such service without prior Commission approval, but the utility shall promptly submit an advice letter to the appropriate Industry Division to notify the Commission of the utility's provision of such service and of the rates, charges, terms and conditions under which the service is provided. Although the advice letter may be effective pending disposition under General Rule 7.5.3, the Commission may determine, in an appropriate proceeding, the reasonableness of such service.")

<sup>2</sup> According to Merriam-Webster, a parcel is as a tract or plot of land. Parcels may have one or more housing units. See: <https://www.merriam-webster.com/dictionary/parcel>.

<sup>3</sup> In Rule 20 Section B, PG&E will convert its overhead electric facilities to underground along public streets and roads or other locations mutually agreed upon when requested by the applicant under circumstances where a project does not qualify under the public interest criteria in the Rule 20A Tariff. According to Rule 20B Section 3, the project must be at a minimum 600 feet or one block and underground both sides of the street.

<sup>4</sup> Rule 20B applicants pay for up to 80 percent of the cost of Rule 20B projects.

2. The street or road or right-of-way is extensively used by the general public and carries a heavy volume of pedestrian or vehicular traffic;
3. The street or road or right-of-way adjoins or passes through a civic area or public recreation area or an area of unusual scenic interest to the general public; and
4. The street or road or right-of-way is considered an arterial street or major collector as defined in the Governor's Office of Planning and Research General Plan Guidelines.<sup>5</sup>

Once a community has identified a project that is in the public interest and has passed a municipal resolution forming an undergrounding district, the community can initiate the project with the utility. To fund the project, the community may utilize its accrued annual Rule 20A work credit allocations plus borrow forward future work credit allocations for a maximum of five years from the utility.<sup>6</sup> Upon completion of undergrounding projects, the utility requests approval from the Commission during the General Rate Case to include completed projects in its rate base and recover the project costs from ratepayers.

On December 11, 2001, the Commission issued Decision (D.) 01-12-009 in the Rulemaking (R.) 00-01-005, which clarified that the heavy vehicular traffic criterion should be focused on arterial and major collector streets as defined by the Governor's Office of Planning and Research (OPR). The Commission added a fourth public interest criteria criterion, which states the project street, road or right-of-way must be considered an "arterial" street or "major collector" as defined in the OPR's General Plan Guidelines. According to the 2003 OPR General Plan Guidelines, an "arterial" is defined as a:

"Medium-speed (30-40 mph), medium-capacity (10,000-35,000 average daily trips) roadway that provides intra-community travel and access to the county-wide highway system. Access to community arterials should be

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<sup>5</sup> See PG&E's Rule 20 Tariff: [https://www.pge.com/tariffs/tm2/pdf/ELEC\\_RULES\\_20.pdf](https://www.pge.com/tariffs/tm2/pdf/ELEC_RULES_20.pdf)

<sup>6</sup> PG&E's allocation of Rule 20A work credits is based on a formula that allows it to distribute work credits proportionally based on the number of customer accounts (meters) in a community. See PG&E's Rule 20A §2. a and b for more details.

provided at collector roads and local streets, but direct access from parcels to existing arterials is common.”<sup>7</sup>

Additionally, a “major collector” is defined as a:

“Relatively-low-speed (25-30 mph), relatively-low-volume (5,000-20,000 average daily trips) street that provides circulation within and between neighborhoods. Collectors usually serve short trips and are intended for collecting trips from local streets and distributing them to the arterial network.”<sup>8,9</sup>

In addition to utilizing the State’s General Plan Guidelines, the utilities commonly refer to the California Department of Transportation’s (Caltrans) California Road System maps and road functional classification data to aid their assessment of heavy traffic volume and the classification of the roads in proposed project areas.

On October 27, 2016, the Commission approved PG&E’s Advice Letter (AL) 4729-E request to deviate from Rule 20A to include some ancillary streets that did not meet the public interest criteria in Rule 20A within the City of Berkeley’s Grizzly Peak Boulevard Undergrounding Project through Resolution E-4752. The City of Berkeley originally formed its utility undergrounding district for the Grizzly Peak project in 1993 and the entire 7,800 linear foot project qualified for Rule 20A at the time. Following PG&E’s adoption of the revised Rule 20A Tariff in 2002 per D.01-12-009, 6,100 linear feet (78 percent) of the project area still met the Rule 20A criteria.<sup>10</sup> The Commission approved the

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<sup>7</sup> 2003 General Plan Guidelines, page 256. For the full text of the State’s 2003 General Plan Guidelines, see: [http://opr.ca.gov/docs/General\\_Plan\\_Guidelines\\_2003.pdf](http://opr.ca.gov/docs/General_Plan_Guidelines_2003.pdf).

<sup>8</sup> Ibid, page 257.

<sup>9</sup> For more information about the State’s General Plan Guidelines, please see: <http://opr.ca.gov/planning/general-plan/>.

<sup>10</sup> None of the ancillary streets and parcels in the Grizzly Peak project (1,700 linear feet, equal to 22 percent of the project area) qualified any longer under the revised Rule 20A Tariff.

deviation request and clarified that it was not setting precedence for future deviation requests through Resolution E-4752.<sup>11</sup>

On May 19, 2017, the Commission opened the Rulemaking (R.) 17-05-010 to review issues related to undergrounding of electric distribution lines, and specifically to consider the revisions to the IOUs' Rule 20 programs. Among other topics, R.17-05-010 will evaluate whether the public interest criteria for Rule 20A projects should be updated.

### **Piedmont Pines Phase II Project Background**

In 1987, the Homeowner's Association for Piedmont Pines, a neighborhood in the Oakland Hills, submitted a request to place utility lines underground. The City of Oakland put the project in its queue until 2000, when the City had accumulated sufficient Rule 20A work credits to proceed with the project.

In May 2000, the City formed the utility undergrounding district for the Piedmont Pines undergrounding project consisting of approximately 15 miles of roadway and 1,350 properties out of 660 parcels. At PG&E's request, the City divided the undergrounding project into three phases to make the construction timeline more manageable. (See Attachment A for the engineer's map of the phased project area.) Piedmont Pine Phase I, which is within the blue boundaries of the map in Attachment A, was 15,154 linear feet and cost \$13,740,062. Piedmont Pine Phase I was completed in 2014.

Following the completion of Phase I, the City requested that PG&E initiate the Phase II project once it had accumulated enough Rule 20A work credits to proceed. The Phase II project, shown in the red boundaries of the map in Attachment A, includes Chelton Drive, Darnby Drive, Carisbrook Lane, and a

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<sup>11</sup> Resolution E-4729 states on page 5,

"The Commission is not setting precedence by approving this requested deviation as this is a unique situation whereby both the boundaries of the [utility undergrounding district] were defined and adopted long before Rule 20A tariff was revised in 2002 and because the City [of Berkeley] assessed and the residents paid for associated costs for streetlight conversion and other public improvements associated with the underground project that did not qualify for Rule 20A funds."

short segment of Skyline Boulevard. Piedmont Pines Phase II would replace 9,161 circuit feet of overhead lines serving 223 parcels at a cost of \$16,495,000.

The City anticipates that Phase III will commence after completing Phase II and the City accumulates enough Rule 20A work credits to proceed with that phase. Phase III, shown in the purple boundaries of the map in Attachment A, is estimated to cost \$14,975,842 and will underground about two miles of overhead distribution lines along the roadway as well as lateral service lines for the residents in that area. The City of Oakland currently has a Rule 20A work credit balance of \$23,757,357 and can borrow forward an additional \$8,461,280 pursuant to the Rule 20(A)(2)(c).<sup>12</sup> Between existing work credit balance and its ability to borrow forward the City has access to sufficient work credits to accomplish Phase II and III of the project.

#### **AL 5464-E Background**

On January 4, 2019, PG&E filed Advice Letter 5464-E requesting a deviation from Electric Rule 20A citing section 9.2.3 of General Order 96-B. In AL 5464-E, PG&E specifically requests to deviate from Rule 20A to include within the City of Oakland's Piedmont Pines Phase II undergrounding project some ancillary streets and parcels that do not meet the Rule 20A Tariff's public interest criteria. PG&E acknowledged that only about 530 feet (5.79 percent) of the City of Oakland's Phase II 9,161 linear feet project would qualify under Rule 20A. PG&E found that the remaining 8,631 feet (94.21 percent) do not, based on its review of the 2018 engineering analysis provided in Attachment A of AL 5464-E. According to PG&E, the streets that are in the middle of the of the Phase II project area do not meet any of the Rule 20A criteria.<sup>13</sup>

In AL 5464-E, PG&E requested the Commission to grant a deviation request for the Piedmont Pines Phase II project for two reasons. The City formed its undergrounding district based on the City's interpretation of the heavy traffic volume criteria in the Rule 20A Tariff dating back to 2000. Additionally, PG&E

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<sup>12</sup> This is based on a utilizing a five-year borrow per the Rule 20A Tariff based on annual work credit allocation of \$1,692,256.

<sup>13</sup> This is shown in the map in Attachment A of AL 5464-E and Attachment A of the instant resolution as the solid dark grey lines within the red boundary

argued that the Commission should evaluate the eligibility of the Phase II project based on a holistic view of the grander Piedmont Pines Area Undergrounding project. They assert that 476 parcels (72 percent) of the 660 parcels in the grander project area meet the criteria for Rule 20A eligibility. Within the Phase II project, PG&E explains that there are 223 parcels and 15 of them would qualify under Rule 20A.

On March 21, 2019, PG&E filed a partial supplemental AL 5464-E-A at the Energy Division's request to provide additional information to inform the disposition of the advice letter. This includes the City of Oakland's May 2000 municipal resolution forming the utility undergrounding district, the City's April 2000 Staff Memoranda recommending the adoption of the proposed utility undergrounding district for the greater Piedmont Pines undergrounding project, the scope and cost of the Phase II project, the City of Oakland's Rule 20A work credit balance, and the City of Oakland's future Rule 20A projects. Additionally, PG&E included a City of Oakland Council Agenda report from 2011 highlighting that the Phase II project was the City of Oakland's top priority undergrounding project based on its "first come, first serve" policy and proposed Rule 20A undergrounding projects.

## **NOTICE**

Notice of AL 5464-E was made by publication in the Commission's Daily Calendar. Pacific Gas and Electric states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

## **PROTESTS AND LETTERS OF SUPPORT**

The Piedmont Pines Neighborhood Association (PPNA) sent a timely letter of support of Advice Letter 5464-E on January 14, 2019. The PPNA described three main arguments for granting a deviation for the Phase II project:

1. The Commission should consider the Piedmont Pines Area Undergrounding project as a whole.
2. At the time of Oakland's 2000 resolution, the City believed that the streets within the Phase II project area satisfied the "heavy vehicular traffic" criteria.

3. The Chelton Drive corridor in the Phase II project area is a key access route to the East Bay Regional Parks, Roberts Regional Recreation Area and Shepard Canyon Park.

Advice Letters 5464-E and 5464-E-A were not protested.

## **DISCUSSION**

PG&E's ALs 5464-E and 5464-E-A are denied for the reasons discussed below.

**PG&E and City of Oakland did not present compelling information to support their deviation request for the Phase II project and the request is denied.**

We considered each of the primary arguments presented by PG&E and City of Oakland and disagree with them for the reasons described below.

***(1) At the time of its 2000 Municipal Resolution, Oakland Believed that the Streets within the Piedmont Pines Area Undergrounding Project Met the Rule 20A Heavy Vehicular Traffic Criterion.***

Documents provided in supplemental AL 5464-E-A demonstrate that the City of Oakland and PG&E knew at the time when the City formed the undergrounding district in 2000 that only 40% of the greater Piedmont Pines project met Rule 20 A criteria then in place. To argue that the City made a good faith interpretation of the Rule 20A criteria is contradicted by the City's own documents. The fact is the Phase II Piedmont Pines project did not meet the Rule 20A criteria in place at the time of forming the undergrounding district. The project also does not meet the criteria in place today.

### *Detailed Explanation*

PG&E explains that the City believed that it made a reasonable interpretation of the term "heavily travelled streets" based on traffic counts and relied on this interpretation of the Rule 20A tariff rules back in 2000 when it initiated the Piedmont Pines Project.<sup>14</sup> PG&E acknowledges that the Commission in 2001 clarified that the heavy vehicular traffic criterion should be focused on arterial

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<sup>14</sup> PG&E mentions in AL 5464-E that the City of Oakland's Traffic Engineering and Ordinance No. 7769 C.M.S., concluded that all the streets that make up the Piedmont Pines Area Undergrounding Project area had a "heavy volume of vehicular traffic".



and major collector streets. However, the Oakland City had already adopted its resolution forming the utility undergrounding district for the Piedmont Pines Area Undergrounding Project.

The Commission has reviewed the supplemental AL 5464-E-A and the City of Oakland's 1998 Piedmont Pines Traffic Study ("Traffic Study") and has determined that PG&E's argument does not have merit. In the City of Oakland's April 2000 Council Agenda Report in Attachment B of AL 5464-E-A, PG&E and Pacific Bell (now AT&T) qualified 40 percent of the streets for Rule 20A funding while the remaining 60 percent failed to qualify. The City of Oakland did not subsequently work with the utilities to revise the project boundaries such that more of the project qualified. Instead, the City Staff recommended that the Oakland City Council approve the utility undergrounding district for the proposed project. According to the April 2000 report, the City of Oakland staff wrote that it "expects that the CPUC's final say on this street will be in the City's favor." It is clear that the City of Oakland knew that a significant portion of the project did not qualify under the Rule 20A Tariff back in 2000.

The results of the City of Oakland's 1998 Piedmont Pines Traffic Study shown in Attachment B, do not support the notion that the roads in the Phase II project area serve the general public, given that they carry a relatively low volume of traffic for a purported corridor. The recorded traffic volume was 754 daily trips for the Phase II project area.<sup>15</sup> Based on the current Rule 20A criteria, this is significantly lower than the required minimum thresholds of 5,000 and 10,000 daily trips for major collectors and arterials respectively. Thus, the traffic volume in the Phase II project's streets are far from meeting this Rule 20A criteria. While the City of Oakland Staff may be convinced that there is heavy traffic volume in the area, their recorded volume is well below the threshold defined by the State of California. The State has clear thresholds for traffic volume which are based on the State's General Plan Guidelines and Caltrans's California Road System which indicate the degree to which roads are used by the general public.

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<sup>15</sup> The City of Oakland recorded 5,279 vehicle trips in 1998 over the course of the week they deployed traffic counters and determined that there was an average of 754 vehicle trips per day specifically in the Phase II project area.

***(2) The City claims the Chelton Drive corridor in the Phase II project area is a key access route to the East Bay Regional Parks, Roberts Regional Recreation Area and Shepard Canyon Park.***

We found no evidence to support the statement that the Chelton Drive, the main road in the Phase II project, serves any road users beyond the Piedmont Pines residents, and therefore, justifies a ratepayer-funded Rule 20A undergrounding project along these roads. For instance, Chelton Drive is not directly accessible from:

- State Highway 13, which connects Oakland to Berkeley;
- Skyline Boulevard, which connects to various nature parks, including the East Bay Regional Parks, Roberts Regional Recreation Area and Shepard Canyon Park in the Oakland Hills; or
- Mountain Boulevard, a major thoroughfare that travels through the Montclair commercial district in Oakland.

These roads are all shown in the Caltrans California Road System maps in Attachment C. The only component of the Phase II project that appears to serve the general public is the approximately 530-foot segment of Skyline Boulevard.<sup>16</sup> Additionally, Darnby Drive, which is along the corridor of the Phase II project, appears to be a one-lane road that has slopes in excess of 25 percent gradient and has no lane striping.<sup>17</sup> It is unlikely that such a narrow, steep road would be suitable for two-way, heavy vehicular traffic.

***(3) The Commission Should Consider the Piedmont Pines Area Undergrounding Project as a Whole.***

The Commission is not persuaded to approve a deviation from Rule 20A Tariff because a municipality expects that all phases of a project are to be completed. PG&E's argument to consider the project as a whole is not convincing, because the City knew that the majority of the project area did not

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<sup>16</sup> Caltrans classifies Skyline Boulevard as a major collector as denoted in Attachment C.

<sup>17</sup> According to Google Maps, the entire Phase II project is characterized by steep grades and gains 558 feet over 1.2 miles from the intersection of Chelton and Ascot Drives to Carisbrook Drive and Skyline Boulevard. This an average of about 10 percent gradient across the entire length, which is steep and dangerous for heavy vehicular traffic. For more information see <https://goo.gl/maps/skLjKx7stoiau9s69>. Also, see Attachment D for a Google Maps street view image of Darnby Drive.

qualify for Rule 20A criteria at the time of its inception. This argument sidesteps the fact that less than six percent of the Phase II project qualifies under Rule 20A.<sup>18</sup>

Additionally, the utilities determine eligibility under Rule 20A Section 1.a based on the individual streets that qualify in a given phase, not the number of parcels. While the number of parcels in areas that qualify for Rule 20A for the broader Piedmont Pines undergrounding project is a relevant data point, the Tariff specifically refers to the streets in the eligibility criteria, not the parcels. Even if the Commission were to consider the number of parcels as a basis for a deviation, only 15 of the 223 parcels in the Phase II project area “qualify” under Rule 20A according to PG&E.<sup>19</sup>

**Piedmont Pines is Oakland’s top priority for undergrounding, but the Phase II project does not fit Rule 20A criteria.**

We acknowledge that Piedmont Pines is Oakland’s top priority undergrounding project. Supporting local community priorities is compelling, but in this instance the gap between the Phase II project and Rule 20A criteria is too large to justify a deviation from the program rules.

**Rule 20B is available to PG&E and the City of Oakland to provide some ratepayer funding for the Phase II Project**

The City of Oakland and PG&E could pursue the Piedmont Pines Phase II project areas that do not meet the Rule 20A criteria as a Rule 20B project in accordance with the Rule 20B Tariff.<sup>20</sup> The City of Oakland and the residents would be responsible for the bulk of Phase II project costs but they would benefit from approximately a 20 to 40 percent ratepayer subsidy per Rule 20B.<sup>21</sup>

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<sup>18</sup> Based on the findings of the 2018 engineering report shown in Attachment A.

<sup>19</sup> Numbers as PG&E reported to Staff via emails dated July 18 and July 22, 2019.

<sup>20</sup> Under the Rule 20B program, potential applicants such as the City of Oakland may request the electric utility to replace its overhead electric facilities with undergrounding electric facilities in areas that do not qualify for Rule 20A ratepayer funding.

<sup>21</sup> According to Rule 20B Section 5, PG&E would cover the cost of removal of the overhead facilities. The City of Oakland may also request PG&E to pay for the engineering and design costs in Rule 20B projects and subsequently reimburse PG&E in the event the project moves forward according to Rule 20B Section 4.

## **COMMENTS**

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review. Please note that comments are due 20 days from the mailing date of this resolution. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

## **FINDINGS**

1. Under Rule 20A, the Commission requires the utilities to allocate a certain amount of work credits each year to all communities serve for undergrounding projects.
2. Communities can utilize work credit allocations that are banked and borrowed forward up to five years to fund undergrounding projects.
3. Projects must meet one of four public interest criteria listed in PG&E's Rule 20A Tariff for them to qualify under Rule 20A.
4. In 2001, the Commission clarified that the heavy vehicular traffic criterion should be focused on arterial and major collector streets in D.01-12-009 and added a fourth criterion to Rule 20A to this effect.
5. According to the Governor's Office of Planning and Research General Plan Guidelines, major collectors and arterials accommodate a minimum of 5,000 and 10,000 vehicle trips per day respectively.
6. In May 2000, the City of Oakland formed the Piedmont Pines utility undergrounding district project consisting of approximately 15 miles of roadway and 1,350 properties.
7. At PG&E's request, the City of Oakland divided the Piedmont Pines undergrounding project into three phases of approximately equal size.
8. Piedmont Pine Phase I was completed in 2014 and it undergrounded 15,154 linear feet of overhead distribution facilities at a cost of \$13,740,062.
9. The Phase II project is to replace 9,161 circuit feet of overhead lines and is estimated to cost \$16,495,000.

10. Phase III is estimated to cost \$14,975,842 and will underground about two miles of overhead distribution lines along the roadway as well as lateral service lines for the residents in that area.
11. The City of Oakland currently has a work credit balance of \$23,757,357 and can utilize an additional \$8,461,280 pursuant to the Rule 20(A)(2)(c).
12. On January 4, 2019, PG&E filed Advice Letter (AL) 5464-E requesting a deviation from Electric Rule 20A citing section 9.2.3 of General Order 96-B.
13. PG&E acknowledged in AL 5464-E that the City of Oakland's 2018 engineering analysis showed that about 530 feet (5.79 percent) of the Phase II project meet the Rule 20A criteria while the remaining 8,631 feet do not.
14. PG&E requested the Commission to approve the deviation for Piedmont Pines area undergrounding project, because the City staff found that the project met the Rule 20A heavy vehicular traffic criterion based what City staff believed was a good faith interpretation of heavy traffic volume.
15. On January 14, 2019, the Piedmont Pines Neighborhood Association sent a letter of support for Advice Letter 5464-E.
16. On March 21, 2019, PG&E filed a partial supplemental AL 5464-E-A at the Energy Division's request to provide additional information to inform the disposition of the advice letter.
17. Documents included with PG&E AL 5464-E demonstrate that PG&E and the City of Oakland knew that only 40 percent of the project area of the grander Piedmont Pines Undergrounding Project qualified under Rule 20A at the time the project was initiated.
18. The City of Oakland determined in a 1998 traffic study that there was an average of 754 vehicle trips per day in what is now the Phase II project area.
19. 754 vehicle trips per day is lower than the State of California's minimum 5,000 daily trip threshold for major collectors and arterials and is thus far from meeting this Rule 20A Criteria.
20. There is no evidence to support the statement that the Chelton Drive corridor serves significant volume of road users beyond the Piedmont Pines residents.
21. The utilities determine eligibility under Rule 20A based on the individual streets that qualify in a given phase, not the number of parcels.
22. Rule 20B is available to PG&E and the City of Oakland to provide some ratepayer funding for the Phase II Project.

Therefore it is ordered that:

1. PG&E's request to deviate from Rule 20A for the City's Phase II of the Piedmont Pines Area Underground Project is denied.

2. PG&E Advice Letter 5464-E and Advice Letter 5464-E-A are denied.

This Resolution is effective today.

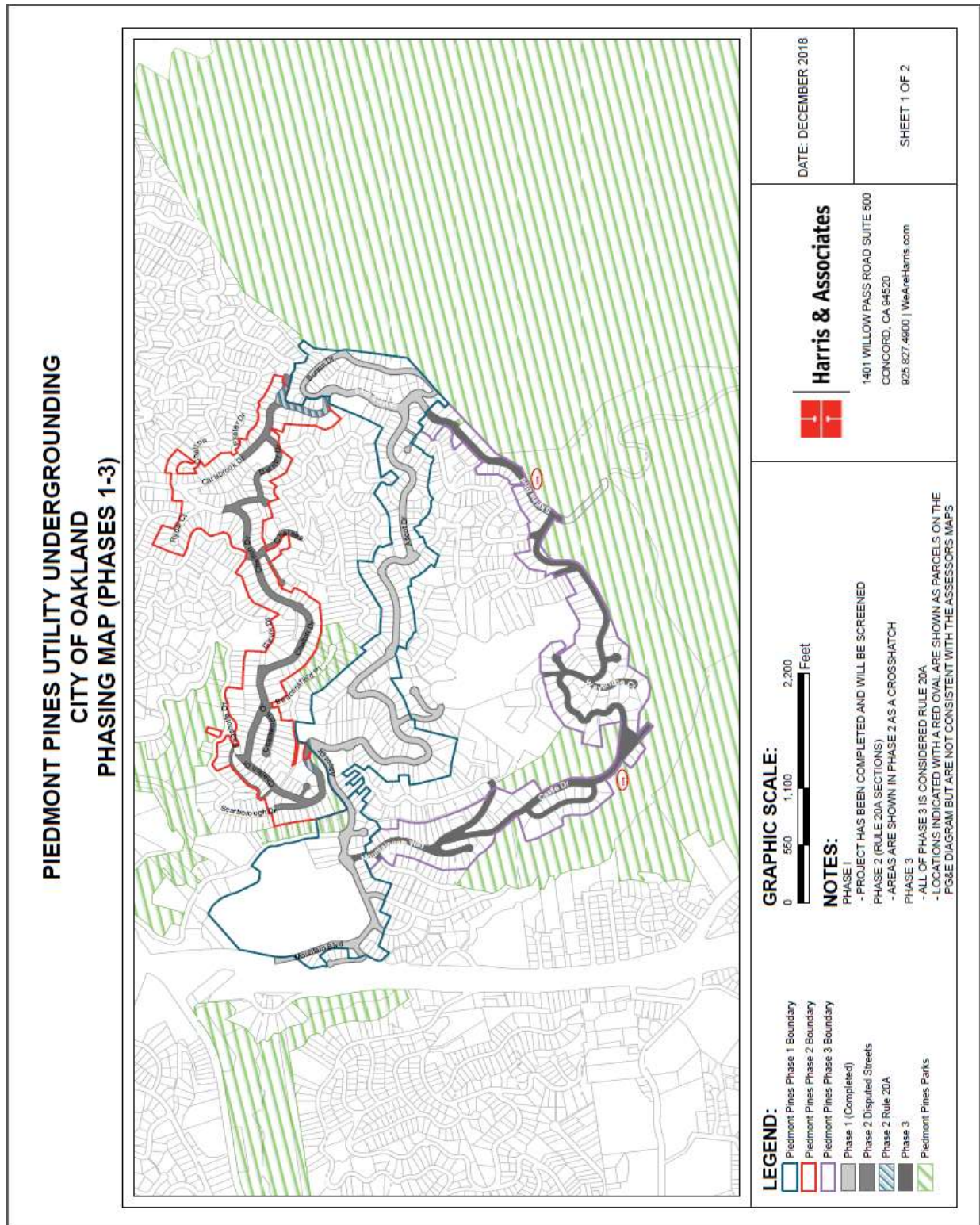
I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on September 12, 2019; the following Commissioners voting favorably thereon:

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ALICE STEBBINS  
Executive Director



# **ATTACHMENT A** **Piedmont Pines Project Phasing Map**







B2. Traffic Count Data

*prepared 10/28/98*

PIEDMONT PINES

LOCATION	STREET NAME	DATE COUNTER INSTALLED	DATE COUNTER REMOVED	NUMBER OF VEHICLES	DISTANCE FROM CORNER
1	La Cuesta	8/11/98	8/18/98	1635	110' in
2	Camino Lenada	"	"	1335	20' in
3	Las Aromas	"	"	1236	70' in
4	Mastlands Drive	"	"	707	50' in
5	Castle Park Way	"	"	990	25' in
6	Castle Park Way	"	"	582	20' in
7	Scarborough Dr.	8/18/98	9/25/98	1115	150' in
8	Chelton Lane	"	"	848	20' in
9	Chelton Lane	"	"	371	35' in
10	Scarborough Dr.	"	"	262	165' in
11	Bagshotte Dr.	"	"	1635	20' in
12	Chatsworth Ct.	"	"	1507	30' in
13	Beaconsfield Pl.	8/25/98	9/1/98	456	90' in
14	Mastlands Drive	"	"	839	100' in
15	Morley Drive	"	"	1287	35' in
16	Camelford Pl.	"	"	765	35' in
17	Longcroft Dr.	"	"	1204	155' in
18	Camelford Pl.	"	"	731	105' in
19	Weybridge Ct.	9/1/98	9/8/98	416	175' in
20	Holyrood Dr.	"	"	964	265' in
21	Melville Dr.	"	"	1045	75' in
22	Totterdell Dr.	9/8/98	9/15/98	440	100' in
23	Wilton Drive	9/1/98	9/15/98	3112	140' in
24	Melville Dr.	9/8/98	9/15/98	1300	120' in
25	Longwalk Drive	"	"	747	120' in
26	Holyrood Dr.	9/15/98	9/22/98	1998	110' in
27	Chelsea Dr.	"	"	860	195' in
28	Haverhill Dr.	"	"	433	140' in
29	Haverhill Dr.	"	"	745	120' in
30	Longcroft Dr.	"	"	235	60' in
31	Clive Ave.	"	"	1124	210' in
32	Chelsea Dr.	9/22/98	9/29/98	3768	50' in
33	Chelsea Dr.	"	"	1870	65' in
34	Girvin Dr.	"	"	1776	40' in
35	Escher Dr.	"	"	298	55' in
36	Westover Dr.	"	"	1203	65' in
37	Pelham Pl.	"	"	437	55' in
38	Westover Dr.	9/29/98	10/6/98	804	60' in
39	Pelham Pl.	"	"	483	30' in
40	Thackeray Dr.	"	"	1961	20' in
41	Thackeray Dr.	"	"	1329	60' in
42	Girvin Dr.	"	"	1124	60' in
43	Thackeray Dr.	"	"	762	25' in
44	Girvin Dr.	10/6/98	10/13/98	1064	60' in

B2. Traffic Count Data (Continued)

LOCATION	STREET NAME	DATE COUNTER INSTALLED	DATE COUNTER REMOVED	NUMBER OF VEHICLES	
45	Girvin Dr.	10/6/98	10/13/98	1078	55' in
46	Pelham Pl.	"	"	534	140' in
47	Thackeray Dr.	"	"	643	70' in
48	Chelsea Dr.	"	"	781	145' in
49	Girvin Dr.	"	"	1027	105' in
50	Stockbridge Dr.	10/13/98	10/20/98	1114	100' in
51	Carlsbrook Dr.	"	"	559	70' in
52	Stockbridge Dr.	"	"	3941	20' in
53	Chelton Dr.	"	"	5279	60' in
54	Carlsbrook Dr.	"	"	1096	35' in
55	Carlsbrook Dr.	"	"	4183	40' in
56	Darnby Drive	10/20/98	10/27/98	2710	60' in
57	Clive Ave.	"	"	539	150' in
58	Darnby Drive	"	"	1541	165' in
59	Longwalk Drive	"	"	549	65' in
60	Carlsbrook Dr.	"	"	4139	60' in
* 61	Burton Drive	9/1/98	9/15/98	4902	50' in
* 62	Shirley Dr.	"	"	1952	150' in

\* Locations 23, 61, & 62 should have counters installed for the same two (2) weeks which should include the weekend of September 5 and 6.

B3. City of Oakland Heavy Vehicular Traffic Interpretation

Sent By: City of Oakland (Y2K); 238 7415; Apr-26-99 7:49AM; Page 1/1

To: VICTOR LASSEY

Fax: 5411

From: I. JEEVA.

(b) A street that is being considered for inclusion in the Underground Utility District shall be deemed as "carrying heavy vehicular traffic" and therefore satisfying C.P.U.C. Rule 20A that states, "The street or road or right-of-way is extensively used by the general public and carries a heavy volume of pedestrian or vehicular traffic," if the street satisfies any one of the following criteria:

- (1) If the vehicular traffic count averages to 8 or more vehicle trips per residence per day on a street that is not designated as a collector or arterial street in the City's General Plan.
- (2) If the vehicular traffic count is at least 500 vehicles per day and averages to 8 or more vehicle trips per residence per day on a street that is designated as a collector street in the City's General Plan.
- (3) If the vehicular traffic count is at least 2,000 vehicles per day and averages to 8 or more vehicle trips per residence per day on a street that is designated as an arterial street in the City's General Plan.

(c) The following streets are hereby deemed to have satisfied C.P.U.C Rule 20A between the designated cross streets:

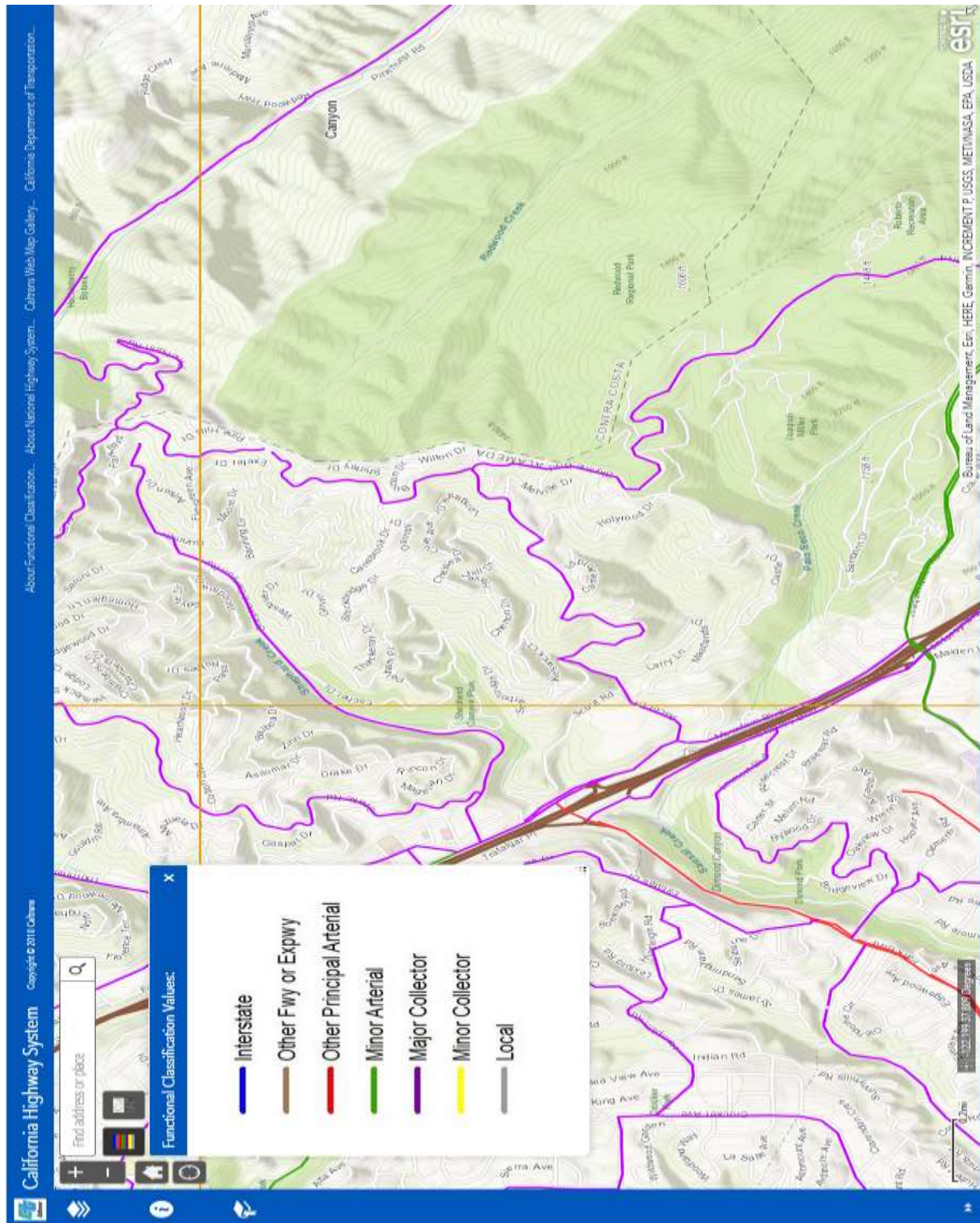
<u>Street Name</u>	<u>Cross Street</u>	<u>Cross Street</u>
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B4. Traffic Counter Locations and Data

Counter Location/ STREET NAMES	Counts	Days/ Time	Homes			
Mustardos Dr Larry Ln	3564	7	42	$\frac{3564}{7} = 509$	$\frac{509}{42} = 12.12$	
Weybridge Cr	416	7	7	$\frac{416}{7} = 59.4$	$\frac{59.4}{7} = 8.4$	
Castle Park Wy	1572	7	18	$\frac{1572}{7} = 224.5$	$\frac{224.5}{18} = 12.4$	
Morley Dr Blanchford Ct	1287	7	14	$\frac{1287}{7} = 183.8$	$\frac{183.8}{14} = 13.1$	
Camelford Ct/Pl Mall Ct	1496	7	26	$\frac{1496}{7} = 213.5$	$\frac{213.5}{26} = 8.2$	
Searsborough Dr	1377	7	24	$\frac{1377}{7} = 196.7$	$\frac{196.7}{24} = 8.2$	
Chelton Ln	1219	7	12	$\frac{1219}{7} = 174.1$	$\frac{174.1}{12} = 14.5$	
Holyrood Dr	6531	14	54	$\frac{6531}{14} = 466.5$	$\frac{466.5}{54} = 8.64$	
Chatsworth Ct	1507	7	17	$\frac{1507}{7} = 215.2$	$\frac{215.2}{17} = 12.6$	



**ATTACHMENT C**  
Caltrans Maps







**ATTACHMENT D**  
Google Maps Image of Darnby Drive

